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8 Attorney for
9 BLACK & VEATCH CONSTRUCTION, INC.

10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 In Re:
14 PG&E CORPORATION,
15 - and -
16 PACIFIC GAS AND ELECTRIC
17 COMPANY,
18 Debtors.

Bankruptcy Case
Case No.: 19-30088-DM (Lead Case)
Chapter 11

(Jointly Administered)

**NOTICE OF MOTION FOR ORDER
AUTHORIZING WITHDRAWAL OF
COUNSEL**

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NOTICE OF MOTION

1 TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR COUNSEL OF
2 RECORD:

3 PLEASE TAKE NOTICE that Black & Veatch Construction, Inc., hereby moves this Court
4 for an Order Authorizing Withdrawal of Counsel in the above-captioned chapter 11 cases. This motion
5 (the "Motion") is pursuant to the applicable Rules of Procedure and is based upon this notice, the
6 Motion, the Declaration of Natalie K. Sanders, and the pleadings and documents filed in this case.

7 PLEASE TAKE FURTHER NOTICE that, in accordance with Bankruptcy Local Rule 9014-
8 1(3)(A), any objection to the requested relief, or a request for hearing on the matter, must be filed with
9 the Clerk of Court and served upon the initiating party within 21 days of mailing the notice;

10 Any objection or request for a hearing must be accompanied by any declarations or memoranda
11 of law any requesting party wishes to present in support of its position;

12 If there is no timely objection to the requested relief or a request for hearing, the Court may
13 enter an order granting the relief by default; and

14 In the event of a timely objection or request for hearing, the initiating party will give at least
15 seven days written notice of the hearing to the objecting or requesting party and to any trustee or
16 committee appointed in the case.

1 DATED: May 20, 2022

Respectfully submitted,

2 **BAKER BOTTS L.L.P.**

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4 /s/ Natalie K. Sanders

5 Natalie K. Sanders

6 Attorney for Black & Veatch Construction, Inc.
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Natalie Sanders